

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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*Attorneys For Defendant/Debtor*  
*Robert J. Shafer, Jr.*

In Re:

ROBERT J. SHAFER, JR.,  
  
Debtor.

Case No.: 22-14353

Chapter 7

Judge: Kathryn C. Ferguson

JANE DOE,  
  
Plaintiff,

v.

ROBERT J. SHAFER, JR.,  
  
Defendant.

Adv. Pro. No. 22-1140

Defendant, *Robert J. Shafer, Jr.*, by way of Answer to Plaintiff's Complaint, states as follows:

1. Defendant admits the allegations contained in paragraph 1 of the Plaintiff's Complaint.
2. Defendant admits the allegations contained in paragraph 2 of the Plaintiff's Complaint.
3. Defendant neither admits nor denies the allegations contained in Paragraph 3 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.
4. Defendant neither admits nor denies the allegations contained in Paragraph 4 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.
5. Defendant admits the allegations contained in paragraph 5 of the Plaintiff's Complaint.

6. Defendant admits the allegations contained in Paragraph 6 of Plaintiff's Complaint.
7. Defendant denies the allegations contained in paragraph 7 of the Plaintiff's Complaint.
8. Defendant neither admits nor denies the allegations contained in Paragraph 8 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.
9. Defendant neither admits nor denies the allegations contained in Paragraph 9 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.
10. Defendant neither admits nor denies the allegations contained in Paragraph 10 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.
11. Defendant denies the allegations contained in paragraph 11 of the Plaintiff's Complaint.
12. Defendant denies the allegations contained in paragraph 12 of the Plaintiff's Complaint.
13. Defendant denies the allegations contained in paragraph 13 of the Plaintiff's Complaint.
14. Defendant denies the allegations contained in paragraph 14 of the Plaintiff's Complaint.
15. Defendant denies the allegations contained in paragraph 15 of the Plaintiff's Complaint.
16. Defendant denies the allegations contained in paragraph 16 of the Plaintiff's Complaint.
17. Defendant neither admits nor denies the allegations contained in Paragraph 17 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.
18. Defendant denies the allegations contained in paragraph 18 of the Plaintiff's Complaint.
19. Defendant denies the allegations contained in paragraph 19 of the Plaintiff's Complaint.
20. Defendant denies the allegations contained in paragraph 20 of the Plaintiff's Complaint.
21. Defendant neither admits nor denies the allegations contained in Paragraph 21 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.
22. Defendant neither admits nor denies the allegations contained in Paragraph 22 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.

23. Defendant neither admits nor denies the allegations contained in Paragraph 23 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.

24. Defendant neither admits nor denies the allegations contained in Paragraph 24 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.

25. Defendant neither admits nor denies the allegations contained in Paragraph 25 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.

26. Defendant neither admits nor denies the allegations contained in Paragraph 26 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.

FACTUAL ALLEGATIONS AND BASIS WHY DEBTOR IS NOT ENTITLED TO  
RECEIVE A DISCHARGE OF ANY DEBTS

27. Defendant admits the allegations contained in paragraph 27 of the Plaintiff's Complaint.

28. Defendant denies the allegations contained in paragraph 28 of the Plaintiff's Complaint.

29. Defendant neither admits nor denies the allegations contained in Paragraph 29 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.

30. Defendant denies the allegations contained in paragraph 30 of the Plaintiff's Complaint.

FIRST CAUSE OF ACTION

ROBERT SHAFER JR. CAUSED WILLFUL AND MALICIOUS INJURY TO JANE DOE IN  
VIOLATION OF THE NEW JERSEY SEXUAL ABUSE ACT 2A:61B-1 AND THEREFORE  
DEFENDANT'S DEBT WITH REGARD TO PLAINTIFF SHOULD BE EXEMPTED FROM  
DISCHARGE UNDER 11 U.S.C. § 523(A)(6)

31. Defendant repeats his answers to the allegations in paragraphs 1-30 of the Complaint as though the same were more fully and at length set forth herein verbatim.

32. Defendant denies the allegations contained in paragraph 32 of the Plaintiff's Complaint.

33. Defendant admits the allegations contained in paragraph 33 of the Plaintiff's Complaint.

34. Defendant neither admits nor denies the allegations contained in Paragraph 34 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.
35. Defendant neither admits nor denies the allegations contained in Paragraph 35 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.
36. Defendant neither admits nor denies the allegations contained in Paragraph 36 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.
37. Defendant neither admits nor denies the allegations contained in Paragraph 37 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.
38. Defendant denies the allegations contained in paragraph 38 of the Plaintiff's Complaint.
39. Defendant neither admits nor denies the allegations contained in Paragraph 39 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.
40. Defendant neither admits nor denies the allegations contained in Paragraph 40 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.
- Defendant further states that Paragraph 40 of Plaintiff's Complaint consists entirely of law and is devoid of any factual allegation(s).
41. Defendant neither admits nor denies the allegations contained in Paragraph 41 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.
42. Defendant denies the allegations contained in paragraph 42 of the Plaintiff's Complaint.
43. Defendant denies the allegations contained in paragraph 43 of the Plaintiff's Complaint.
44. Defendant denies the allegations contained in paragraph 44 of the Plaintiff's Complaint.
45. Defendant denies the allegations contained in paragraph 45 of the Plaintiff's Complaint.

SECOND CAUSE OF ACTION

DEBTOR ROBERT J. SHAFER, JR. IS NOT ENTITLED TO ANY DISCHARGE BECAUSE (A) WITH INTENT TO HINDER, DELAY OR DEFRAUD A CREDITOR HE TRANSFERRED OWNERSHIP IN THE MARITAL HOME TO HIS SPOUSE WITHIN ONE YEAR BEFORE THE DATE OF FILING OF THE PETITION OR HAS MADE A FALSE OATH OR ACCOUNT BY STATING THAT DEBTOR IS NO LONGER IN TITLE AND (B) HAS MISLED THE COURT AS TO ITS VALUE

46. Defendant repeats his answers to the allegations in paragraphs 1-45 of the Complaint as though the same were more fully and at length set forth herein verbatim.
47. Defendant neither admits nor denies the allegations contained in Paragraph 47 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.
48. Defendant denies the allegations contained in paragraph 48 of the Plaintiff's Complaint.
49. Defendant neither admits nor denies the allegations contained in Paragraph 49 of Plaintiff's Complaint as he lacks sufficient information and accordingly leaves Plaintiff to her proofs.
50. Defendant denies the allegations contained in paragraph 50 of the Plaintiff's Complaint.
51. Defendant denies the allegations contained in paragraph 51 of the Plaintiff's Complaint.
52. Defendant denies the allegations contained in paragraph 52 of the Plaintiff's Complaint.
53. Defendant denies the allegations contained in paragraph 53 of the Plaintiff's Complaint.

**FIRST SEPARATE DEFENSE**

The Complaint fails to state a claim for which relief can be granted.

WHEREFORE, defendant demands judgment against the Plaintiff dismissing the Complaint and awarding costs of the Defendant.

Date: 7/13/2022

By: /s/ Geoffrey P. Neumann  
GEOFFREY P. NEUMANN